

November 18, 2019

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Re: Notice of Ex Parte, Unlicensed Use of the 6 GHz Band,  
**ET Docket No. 18-295**

Dear Ms. Dortch:

On November 5, 2019, a meeting was held at the Federal Communications Commission among Chief Julius Knapp, Michael Ha, Nicholas Oros, Barbara Pavon and Hugh Van Tuyl of the FCC's Office of Engineering and Technology (OET) and persons from RigNet, Inc., including Jamie Barnett, Senior Vice President for Government Services, in person, and Raul H. Magallanes, Associate General Counsel and Chief Compliance Officer, and Dr. Alexei Vederko, Manager, Global RF Engineering, via conference call.

The purpose of the meeting was to discuss the effects of interference from unlicensed 6 GHz use with the critical communications on the LTE terrestrial network covering approximately 60,000 square miles of seawater in the Gulf of Mexico and, especially, with the beach crossings where the 6 GHz backbone for the network comes ashore. RigNet, Inc. had requested a 35-mile radius exclusion zone around each of the sites where the 6 GHz point-to-point network crosses the shore<sup>1</sup>, and Dr. Vederko and Raul Magallanes noted that the licensure for 6 GHz starts 12 nautical miles from shore except where those crossings occur.

Barbara Pavon and others from OET questioned whether 35 miles of exclusion were necessary for the back lobe of a point-to-point microwave system, and Dr. Vederko committed to reviewing and recalculating the exclusion area to provide the minimum requirement to avoid harmful interference. While the 35-mile exclusion for the main lobe remains, RigNet's new calculations of the required exclusion 180° offset from the direction of the point-to-point for the back lobe is 10 miles. Accordingly, the new exclusion area may be described as being bounded as follows:

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<sup>1</sup> Reply Comments of RigNet Satcom, Inc., February 15, 2019.

- a. The waters of the Gulf of Mexico west from 86 degrees West Longitude
- b. Gulf of Mexico Major Economic Area (MEA as used by the FCC) as the southern boundary
- c. 12 nautical miles from the shore of the United States in the Gulf of Mexico except for beach crossing exclusions zones described below
- d. For each of the antennas whose coordinates are listed in Attachment A, which represent beach crossings through the 12 nautical mile in the Gulf of Mexico coastal zone, the exclusion zone is bounded by a 20-mile wide corridor along the main axis of the Fixed Service path, extending 35 miles to antenna front side, and extending 10 miles to the antenna back side.

The resulting exclusion zone is shown on the two charts enclosed as Attachment B, greatly reducing the sparse population within the exclusion zone and minimizing the area to the smallest area required, as requested by OET. The previous charts covered more population; now only a fraction of the persons in the parishes listed on Attachment C would be affected, but tens of thousands of lives will be protected by these exclusion zones.

We would ask for a finding that the existing licensed 6 GHz microwave network in the Gulf of Mexico supports critical communications network at sea that protect lives, property, critical infrastructure and environmental safety and integrity of oil and gas operations in the Gulf of Mexico and justifies excluding the area of Gulf of Mexico as described, including the revised and minimized exclusion zones for the existing beach crossings that support the network.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed electronically with your office.

Respectfully submitted

RIGNET, INC.

By: [James Arden Barnett, Jr.](#)

Raul Magallanes, Assoc. General Counsel

Brad Eastman, General Counsel

James Arden Barnett, Jr, RDML USN (Ret)

Senior Vice President, Government Services

cc: Julius Knapp  
Ira Keltz  
Ron Repasi  
Paul Murray  
Michael Ha  
Nicholas Oros  
Jamison Prime  
Aspasia Paroutsa  
Bahman Badipour  
Barbara Pavon  
Hugh Van Tuyl  
Zenji Nakazawa  
Aaron Goldberger  
Erin McGrath  
Will Adams  
Travis Litman  
Umair Javed  
William Davenport  
Austin Bonner

**Attachment A**  
**RigNet Licensed Tower Site Coordinates**

<b>Lat</b>	<b>Long</b>
29 40 33.7 N	92 16 10.4 W
29 48 16.0 N	92 08 45.1 W
29 42 02.0 N	091 11 39.2 W
29 34 22.70 N	091 32 11.40 W
29 14 54.0 N	089 58 24.0 W
29 21 18 .7 N	089 31 26.2 W
29 15 52.32 N	89 21 14.73 W
29 26 28.70 N	092 03 51.40 W
29 21 19.00 N	091 46 46.85 W
28 59 07.44 N	090 09 41.04 W
28 55 44.00 N	090 21 09.00 W
28 52 03.80 N	090 29 25.30 W
28 58 17.67 N	089 30 52.85 W
29 07 17.80 N	089 32 50.10 W
28 50 39.90 N	089 23 47.20 W
28 47 27.90 N	089 03 23.10 W
29 15 39.40 N	089 01 49.40 W
29 17 44.70 N	088 50 31.10 W

**Attachment B**  
**Two Charts of Exclusion Zones**  
**(Overview and Detailed)**